

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERKS OFFICE
2004 JUN 25 A 11:18
U.S. DISTRICT COURT
DISTRICT OF MASS.

ROBERT P. GOODRICH,

Petitioner,

v.

TIM HALL,

Respondent.

Civil Action No. 03-12541-NG

JOINT MOTION FOR BRIEFING SCHEDULE

The petitioner, Robert P. Goodrich, and the respondent, Timothy Hall,¹ hereby jointly request that the Court enter the following proposed briefing schedule for the merits of the petition. The dates requested by the parties are as follows:

1. The petitioner's memorandum in support of the merits of the petition shall be due on or before July 19, 2004;
2. the respondent's memorandum in opposition to the merits of the petition shall be due on or before August 20, 2004; and
3. the petitioner's reply memorandum shall be due on or before September 3, 2004.

WHEREFORE, the petitioner and the respondent respectfully request that the Court enter the above proposed schedule as an order of the court.

¹ The respondent asserts, as it did in its motion to dismiss the petition, that the petition contains unexhausted claims and should therefore be dismissed. However, in light of this Court's order of June 7, 2004, denying the motion to dismiss, the respondent will proceed to brief the merits of his position at this time, in accordance with the schedule set forth in this joint motion.

Respectfully submitted,

ROBERT P. GOODRICH,

By his attorneys,

Respectfully submitted,

TIMOTHY HALL,

By his attorneys,

THOMAS F. REILLY
ATTORNEY GENERAL

Jill L. Brenner (nom)
Peter E. Gelhaar (BBO# 188310)
Jill L. Brenner (BBO# 652501)
Donnelly, Conroy & Gelhaar
One Beacon Street, 33rd Floor
Boston, Massachusetts 02108
(617) 720-2880

Maura D. McLaughlin
Maura D. McLaughlin (BBO# 634923)
Assistant Attorney General
Criminal Bureau
One Ashburton Place
Boston, Massachusetts 02108
(617) 727-2200, ex. 2857

Dated: June 24, 2004